

EXHIBIT 174

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity as President of the United States; U.S. DEPARTMENT OF HOMELAND SECURITY; ELAINE C. DUKE, in her official capacity; U.S. CITIZENSHIP AND IMMIGRATION SERVICES; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; and the UNITED STATES OF AMERICA,

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

Defendants.

Pursuant to 28 U.S.C. § 1746(2), I, Kathryn Wylde hereby declares as follows:

1. I am over the age of eighteen and competent to testify.
2. I have been the President and CEO of the Partnership for New York City (the “Partnership”) since 2001.
3. The Partnership is a nonprofit organization representing the city’s business leadership and its largest private sector employers. The Partnership focuses on research, policy formulation and issue advocacy at the city, state and federal levels. We work together with government, labor and the nonprofit sector to promote economic growth and maintain the city’s position as a global center of commerce and innovation.
4. The Partnership’s members come from a wide variety of industries including accounting, advertising, arts and entertainment, consulting, hospitality and retail, education, energy, engineering, financial services, health care, insurance, law, manufacturing, media, real estate, technology, telecommunications and transportation. In 2014, the latest year for which data is available, Partnership members contributed more than five percent (\$900 billion) of the national Gross Domestic Product, 19 percent (\$254 billion) of the Gross State Product of New York and 24 percent (\$158 billion) of the Gross City Product of New York City.¹ Partnership members also employed more than four percent (7 million) of the workforce in the United States, as well as 14 percent (1.5 million) in New York State and 17 percent (839,000) in New York City.²
5. Our membership appreciates the business need for diversity in the workplace, recognizing that it enables them to best serve their increasingly diverse customers and clients. Companies understand that a diverse workforce enhances corporate performance, drives growth and allows them to be competitive in attracting the best talent. Many of the Partnership’s members are at the forefront of efforts to eliminate discrimination in hiring, promotion and compensation.
6. There are nearly 42,000 grantees of the Deferred Action for Childhood Arrivals program (“DACA”) in New York State,³ 30,000 of whom are in New York City.⁴ Many Fortune 500 companies employ DACA recipients. Partnership members comprise 10 percent of the Fortune 500 and New York City is home to the most Fortune 500 headquarters of any U.S. city.⁵

¹ PwC, *Contributions of the Partnership for New York City Members to the New York City, State, and U.S. Economies* (March 2015).

² *Id.*

³ N.Y. State Office of the Att’y Gen., *A.G. Schneiderman Files Lawsuit To Protect Dreamers and Preserve DACA* (September 6, 2017)..

⁴ Laura Figueroa and Ivan Pereira, *DACA Recipients, Allies in NYC Protest Trump’s Repeal of Program*, amNY (September 6, 2017).

⁵ Fortune, *Fortune 500* (2017), available at <http://fortune.com/fortune500/list/>.

7. Partnership member companies depend on New York City's position as a global center of commerce and economic opportunity. This requires a strong New York economy. Ending DACA would cost an estimated \$2.6 billion in lost Gross Domestic Product each year in New York State.⁶ Our members depend on the public safety, sanitation, transportation and other services provided by New York State and New York City and funded by state and local taxes. DACA recipients contribute \$140 million of these funds annually.⁷
8. Currently, 44 percent of New York City's private sector employees are foreign-born.⁸ The Partnership believes that ending DACA would be a signal to the rest of the world that America is no longer a place that embraces talent, hard work and the energy of immigrants. That message would harm the efforts of our member companies to recruit talented employees with diverse skills from across the globe and make it more difficult for New York companies to compete with foreign companies. Furthermore, losing New York's DACA recipients will create a significant burden on the businesses in which they work. The cost to recruit, hire and train their replacements would be considerable.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3rd day of October 2017.



Kathryn Wylde

⁶ Nicole Prchal Svajlenka, Tom Jawetz, & Angie Bautista-Chavez, Ctr for Am. Progress, *A New Threat to DACA Could Cost States Billions of Dollars* (July 21, 2017), available at <https://www.americanprogress.org/issues/immigration/news/2017/07/21/436419/new-threat-daca-cost-states-billions-dollars/>.

⁷ Misha E. Hill & Meg Wiehe, Inst. on Taxation & Econ. Policy, *State & Local Tax Contributions of Young Undocumented Immigrants* (April 2017), available at <https://itep.org/wp-content/uploads/2017DACA.pdf>.

⁸ U.S. Census Bureau, *American Community Survey* (2015).